

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

CURTIS HERTEL, the Register of Deeds and
Representative of **INGHAM COUNTY**; and
NANCY HUTCHINS, the Register of Deeds
and Representative of **BRANCH COUNTY**,
both as Class Representatives of all 83
counties in the State of Michigan.

Plaintiffs,

v.

Case No. 1:12-CV-174
HON. ROBERT HOLMES BELL

**MORTGAGE ELECTRONIC REGISTRATION
SYSTEMS, INC., MERSCORP, INC., JEANNE
KIVI, ELLEN COON, MARSHALL ISAACS,
BANK OF AMERICA N.A., JP MORGAN CHASE & CO,
CHASE HOME MORTGAGE CORPORATION f/k/a
CHASE HOME FINANCE, WELLS FARGO BANK, N.A.,
CITIMORTGAGE INC., eTITLE AGENCY INC,
1ST CHOICE TITLE SERVICES INC, ATTORNEYS
TITLE AGENCY LLC, f/k/a WARRANTY TITLE
AGENCY LLC, , and JOHN DOE** as any other authorized
signers for **MERS** or **MERSCORP, INC.**, and Defendants
JOHN DOE Corporations I - MMM,
Defendants.

**PLAINTIFFS' MOTION FOR RECONSIDERATION OF OPINION [131] AND ORDER
[132] GRANTING JUDGMENT FOR DEFENDANTS**

NOW COMES the Plaintiffs, by and through their attorneys, DANIEL P. MARSH,
PLLC, and WILLIAM MAXWELL for their MOTION FOR RECONSIDERATION OF
“OPINION[131] AND ORDER [132] GRANTING JUDGMENT FOR DEFENDANTS pursuant
to LR 7.1(h) in this matter and states that Plaintiffs’ Motion for Reconsideration should be
granted for the factual arguments and legal reasoning in the accompanying Brief in Support
attached hereto.

WHEREFORE, Plaintiffs respectfully request this Honorable Court reconsider its rulings based on the argument and statutory principles enumerated herein. Plaintiff's motion should be granted since a palpable error has been made in the factual foundation for Defendants' motions, which has misled the court and the parties resulting in genuine issues of material facts continuing to exist on the record about which reasonable minds might differ.

Based on the palpable errors described herein, a different disposition of Defendant's motions is required. For the purpose of this motion for reconsideration, Plaintiffs also rely on all pleadings previously filed in this matter.

RESPECTFULLY SUBMITTED,

By: /s/ William Maxwell, Jr.
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CERTIFICATE OF SERVICE

I hereby certify that on June 3, 2013, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system that will send notification of such filing to all attorneys of record.

By: /s/ William Maxwell, Jr.
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